

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

FILED
United States District Court
Northern District of Alabama

SEP 9 2024

Judge R. David Proctor

FARIBA MOEINPOUR,

Plaintiff,

v.

**BOARD OF TRUSTEES OF THE
UNIVERSITY OF ALABAMA, et al.,**

Defendants.

Case No.: 2:21-cv-01302-RDP

VERDICT AS TO PLAINTIFF'S CLAIM AGAINST UAB

We, the jury, answer the court's questions submitted on this form as follows:

1. Did Plaintiff prove by a preponderance of the evidence that she engaged in protected activity by telling Dr. Grubbs that she intended to complain to Dr. Chen about harassment by Mary Jo Cagle because of her race?

Answer Yes or No

yes

If your answer is "No," this ends your deliberations as to Defendant UAB, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," go to the next question.

2. Did Plaintiff prove by a preponderance of the evidence that Defendant UAB took an adverse employment action against Plaintiff when she was arrested on February 13, 2020?

Answer Yes or No

yes

If your answer is "No," this ends your deliberations as to Defendant UAB, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," go to the next question.

3. Did Plaintiff have a good-faith, reasonable belief that she had been harassed by Ms. Cagle on the basis of her race?

Answer Yes or No yes

If your answer is "No," this ends your deliberations as to Defendant UAB, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," go to the next question.

4. Did Plaintiff prove by a preponderance of the evidence that Dr. Grubbs called the police on February 13, 2020, to prevent Plaintiff from reporting her complaints about racial harassment by Mary Jo Cagle to Dr. Chen?

Answer Yes or No yes

If your answer is "No," this ends your deliberations as to Defendant UAB, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," go to the next question.

5. Did Plaintiff prove by a preponderance of the evidence that her arrest caused her emotional pain and mental anguish for which UAB is responsible?

Answer Yes or No yes

6. If your answer is "Yes," what amount of damages does UAB owe Plaintiff?

\$ 3,000,000

SO SAY WE ALL.

DATE: 9/9/24